

### **REMARKS/ARGUMENTS**

In view of the foregoing amendments and the following remarks, the applicant respectfully submits that the pending claims are not anticipated under 35 U.S.C. § 102. Accordingly, it is believed that this application is in condition for allowance. If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicant respectfully requests that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.

### **Objections**

The drawings were objected to under 35 C.F.R. § 1.83(a) as failing to show figures as described in the specification. (See Paper No. 6, page 2.) Applicant respectfully submits that this objection is improper and should be withdrawn.

The Examiner contends that the drawings fail to show Figures 1, 3, 5, 8, 10-12, 13a, 13c, 13d, 14, 15a-d, 15f-g, 15i, 15k, 16a-c, 18 and 20. This is not true. Figures 1-20 were provided in the 38 sheets of drawings filed as part of the above-captioned application. Receipt of these drawings by the US PTO was acknowledged in the Filing Receipt mailed on February 22, 2001. Later, the US PTO requested corrected drawings with proper margins in a paper mailed on June 4, 2001. Since not all of the drawings had improper margins, only Figures 2, 4, 6, 7, 9, 13b, 15e, 15h, 15j, 17a-c, 19a and

19b were filed on July 12, 2001. Since the remainder of the drawings had proper margins as filed, they were not resubmitted, as was noted in that filing. Accordingly, the US PTO should have a complete set of drawings. However, to expedite the prosecution of this application, applicant has resubmitted, herewith, a complete set of drawings consisting of the drawings originally submitted with proper margins, as well as the corrected drawings filed on July 12, 2001.

### **Rejections under 35 U.S.C. § 102**

Claims 1-26 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,349,306 ("the Malik patent"). Applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

At least some of the claims are not anticipated by the Malik patent because the Malik patent does not teach comparing, on a data forwarding device, locally stored configurations for that particular data forwarding device. At least some of the other claims are not anticipated by the Malik patent because the Malik patent does not verify or compare configurations before a candidate configuration is loaded (i.e., saved) to a data forwarding device as a committed configuration. At least some of the other claims are not anticipated by the Malik patent because the Malik patent does not teach comparing respective hierarchical portions of data forwarding device configurations. Finally, at least some of the other claims are not anticipated by the Malik patent because the Malik patent does not teach showing changes

to configuration statements without regard to parameters of the statements. Each of these features is addressed below with reference to the claims.

The Malik patent concerns network management, including remote, centralized configuration of devices on the network. (See, e.g., Figure 1, column 3, lines 13-23, and column 5, lines 35-43.) In the Malik patent, a "configuration" is defined as a particular setting of device parameters that govern the operational characteristics of a network device (See, e.g., column 1, lines 22-24.), or all attribute/value pairs obtained by interrogating selected models through a template (See, e.g., column 3, lines 59-61.). In the Malik patent, "models" are defined as representing different associated network devices, and each model includes attribute values for parameters of the particular network device. (See, e.g., column 2, lines 11-13.) Finally, in the Malik patent a "template" is defined as a list of attributes for a device of a certain model type. (See, e.g., column 3, lines 24-26.) To reiterate, as shown in Figure 1, the configuration management system 18 is separate from the device of a live network 10 actually being configured. This remote, centralized configuration management does not teach comparisons by a data forwarding device of configurations, for the data forwarding device, stored on the data forwarding device.

In the Malik patent, a verification step permits the comparison of attribute/value pairs of a loaded (i.e., saved) configuration of a model with the actual attribute/value pairs captured from the model, and the display of the results of such a comparison. (See, e.g., column 9, lines 20-27.) The output may be a report of

discrepancies between attribute/value pairs after the comparison. (See, e.g., column 7, lines 34-42.) More specifically, in the Malik patent, the verify option enables a user to verify whether the actual attribute values of a model match previously loaded attribute values of a created configuration. (See, e.g., column 8, lines 14-16.) Thus, the verify configuration function in the Malik patent is limited to comparing values of attributes in two configurations -- one configuration as loaded to a device, and the other as read from the device. The teaching does not extend to comparing a configuration that has not been loaded and committed on a device with a configuration that has been saved on the device, nor does it extend to comparing statements without regard to parameter values in such configurations.

Although the Malik patent discusses displaying hierarchical relationships between network devices of a network (See, e.g., Column 4, lines 58-61.), this has nothing whatsoever to do with hierarchically arranged statements in a configuration as claimed.

#### **Claims 2-9**

Independent claim 4 is not anticipated by the Malik patent because the Malik patent does not teach hierarchical statements. Claim 4, as amended, is reprinted below with this feature in bold typeface:

4. A method comprising:
  - a) accepting at least a part of a selected set of configuration information for a data forwarding device;

b) accepting at least a part of a set of candidate configuration information for the data forwarding device; and  
c) determining differences, if any, between

- the at least a part of the set of candidate configuration information for the data forwarding device, and
- the at least a part of the selected set of configuration information for the data forwarding device,

wherein the set of candidate configuration information for the data forwarding device includes a plurality of statements,

**wherein a first statement of the plurality of statements of the set of candidate configuration information for the data forwarding device contains a second statement of the plurality of statements to define at least a part of a hierarchical configuration,**

wherein the selected set of configuration information for the data forwarding device includes a plurality of statements, and

**wherein a first statement of the plurality of statements of the selected set of configuration information for the data forwarding device contains a second statement of the plurality of statements to define at least a part of a hierarchical configuration.** [Emphasis added.]

The Examiner has not addressed this feature of the claims and therefore has not established a prima facie case of anticipation. Accordingly, independent claim 4 is not anticipated by the Malik patent for at least this reason.

Since claims 2, 3, and 5-9 depend, either directly or indirectly, from claim 4, these claims are similarly not anticipated by the Malik patent.

Further, dependent claim 5 is not anticipated by the Malik patent because it further recites that the comparison of configurations only includes a first statement and descendants from the first statement. Further, dependent claim 7 is not anticipated by the Malik patent because it further recites that the first statement is selected by a user. Further, dependent claim 6 is not anticipated by the Malik patent because it recites that the first statement is based on a statement of hierarchical candidate configuration on which the user is presently working. As stated on lines 22-25 of page 23 of the present application, this is advantageous because such hierarchical scoping capabilities may be used to limit a compare configurations operation, thereby permitting users to work on smaller, more manageable parts of sets of configuration information. The Malik patent does not teach such features. Accordingly, these dependent claims are further not anticipated by the Malik patent for at least the foregoing reasons.

Further, dependent 9 is not anticipated by the Malik patent because it recites associating a predetermined permission value with a user that is logged in, and determining whether the logged in user is permitted to access one of at least two categories at a given hierarchical level of configuration information based on the predetermined permission. In this way, the users permitted to access and/or edit various hierarchical levels and categories of configuration information may be limited.

**Claims 10, 13 and 22-26**

Independent claims 10, 13, 22, 23, 25 and 26 are not anticipated by the Malik patent because the Malik patent does not teach comparing, with a data forwarding device, configurations **for that particular data forwarding device**. In at least some of these claims, one or both configurations are stored on the particular data forwarding device. As discussed above, the Malik patent teaches a remote, centralized configuration management. For example, as shown in Figure 1, the configuration management system 18 is separate from the device of a live network 10 actually being configured. This does not teach comparisons by a data forwarding device of configurations **for the particular data forwarding device**, stored on the data forwarding device. Accordingly, independent claims 10, 13, 22, 23, 25 and 26 are not anticipated by the Malik patent for at least this reason. Since claim 24 depends from claim 23, it is similarly not anticipated by the Malik patent.

**Claim 11**

Independent claim 11 is not anticipated by the Malik patent because the Malik patent does not teach determining differences, if any, between at least a part of a set of candidate configuration information for a data forwarding device, and at least a part of a selected set of configuration information for the data forwarding device, by considering changes to configuration statements without regard to parameter values. Claim 11

is reprinted below with this feature depicted in bold typeface:

11. A method comprising:
  - a) accepting at least a part of a selected set of configuration information for a data forwarding device;
  - b) accepting at least a part of a set of candidate configuration information for the data forwarding device; and
  - c) determining differences, if any, between
    - the at least a part of the set of candidate configuration information for the data forwarding device, and
    - the at least a part of the selected set of configuration information for the data forwarding devicewherein the set of candidate configuration information for the data forwarding device includes a plurality of statements, wherein the selected set of configuration information for the data forwarding device includes a plurality of statements, and  
**wherein the act of determining differences, if any, between**
    - the at least a part of the set of candidate configuration information for the data forwarding device, and
    - the at least a part of the selected set of configuration information for the data forwarding device, considers changes to statements without regard to parameter values. [Emphasis added.]



The Malik patent does not teach this feature.

As stated above, in the Malik patent, a verification step permits the comparison of **attribute/value pairs** of a configuration of a model with **attribute/value pairs** of another configuration, and the display of the results of such a comparison. (See, e.g., column 9, lines 20-27.) More specifically, in the Malik patent, the verify option enables a user to verify whether **attribute values** of a model match **attribute values** of a created configuration. (See, e.g., column 8, lines 14-16.) Thus, the verify configuration function in the Malik patent is limited to comparing values of attributes in two configurations. The teaching does not extend to comparing statements in such configurations. Accordingly, claim 11 is not anticipated by the Malik patent for at least this reason.

#### **Claims 14-20**

Independent claim 14 is not anticipated by the Malik patent because the Malik patent does not verify or compare configurations before a candidate configuration is loaded or committed to a data forwarding device. Claim 14, as amended, is reprinted below with this feature depicted in bold typeface:

A method for determining  
differences in at least a part of  
sets of configuration information,  
comprising:  
a) accepting at least a part of  
a first set of configuration  
information for a data  
forwarding device, **wherein the  
first set of configuration  
information has not been saved**

**on the data forwarding device as a committed configuration;**

b) accepting at least a part of a second set of configuration information for the data forwarding device, **wherein the second set of configuration information has been saved on the data forwarding device;** and

c) determining differences, if any, between

- the first set of configuration information for a data forwarding device, and
- the second set of configuration information for a data forwarding device. [Emphasis added.]

As stated in the specification, one advantage of the present invention is that it helps users to detect errors in a candidate configuration information, for example,

**before committing to that candidate configuration**

information. (See, e.g., page 23, lines 20-22.) On the other hand, in the Malik patent, the verify operation is used to confirm whether a load was actually successful or not. More specifically, when a load is commanded, a configuration is loaded from a central terminal to an actual networking device (referred to as a "model"). A user might want to know if the configuration was actually loaded properly. To check this, the user can use the verify operation to capture the actual configuration, as it exists on the model, and compare it to the configuration that was loaded to the model. To put it more simply, in the Malik patent, the load command is like a write command, where the a configuration is sent from a central location to a remote device to be written

onto the remote device. The verify command is like a read and compare command. The previously loaded configuration is compared with a configuration actually read from the device. If the load was successful, the two configurations should be the same. In any event, the comparison occurs after the user already committed the configuration to the device.

In view of the foregoing, claim 14 is not anticipated by the Malik patent for at least this reason. Since claims 15-20 depend, either directly or indirectly from claim 14, they are similarly not anticipated by the Malik patent. Since claim 23, as amended, includes a similar feature, it is similarly not anticipated by the Malik patent.

Further, dependent claim 15 recites a feature similar to that discussed above with reference to claim 4. Accordingly, claim 15 is further not anticipated by the Malik patent for the reason discussed above with reference to claim 4.

Further, dependent claim 19 recites a feature similar to that discussed above with reference to claim 10. Accordingly, claim 19 is further not anticipated by the Malik patent for the reason discussed above with reference to claim 10.

Further, dependent claim 20 recites a feature similar to that discussed above with reference to claim 11. Accordingly, claim 20 is further not anticipated by the Malik patent for the reason discussed above with reference to claim 11.

### **New claims**

New claims 27 and 28 correspond to claims 2 and 3 but depend from claim 10. Similarly, new claims 29 and 30 correspond to claims 2 and 3 but depend from claim 11.

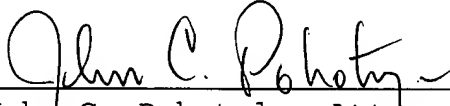
New claim 31 depends from claim 14 and further recites that a command to save the first set of configuration information on the data forwarding device as a committed configuration has not occurred. This feature further distinguishes the claimed invention over the Malik patent.

### **Conclusion**

In view of the foregoing amendments and remarks, the applicant respectfully submits that the pending claims are in condition for allowance. Accordingly, the applicant requests that the Examiner pass this application to issue.

Respectfully submitted,

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**CERTIFICATE OF MAILING under 37 C.F.R. 1.8(a)**

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